

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

Plaintiff,

14 Cv. 8593 (JGK)

-against-

NARCO FREEDOM, INC.

Defendant.  
-----X

**Jason Brand's Motion for an Order Directing  
the Receiver to Pay His Accrued Time.**

This is an application to direct the receiver to pay \$178,166.85 in accrued time to Jason Brand, a former employee of Narco Freedom, Inc, who is an interested party in relation to this action. Annexed hereto is Jason Brand's October 30, 2015 declaration in support of this motion.

Jason Brand is also a defendant in a civil forfeiture proceeding in a separate criminal case in Bronx Supreme Court. Those actions remain pending. In the event that funds are released by the Receiver, those funds would be subject to a March 2015 order of attachment issued by the Bronx Civil Supreme Court at least until the Brands' pending motions to dismiss the civil forfeiture action are decided and/or a motion to dismiss the indictment pursuant to New York Criminal Procedure Law § 210.30 is decided or the criminal case is tried.

Jason Brand joins in the arguments set forth in Alan Brand's October 28, 2015 application insofar as they are applicable to him. Narco Freedom, Inc. owes Jason Brand \$ 178,166.85 in accrued time and the court should direct the receiver to pay that obligation.

Dated: October 30, 2015  
Garden City, New York

Respectfully submitted,

JASPAN SCHLESINGER, LLP

By: /s/Laurel R. Kretzing  
LAUREL R. KRETZING  
*Attorney for Jason Brand*  
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Garden City, New York 11530  
(516) 746-8000

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Declaration of Jason Brand

JASON BRAND, hereby declares the following is true pursuant to 28 U.S.C. 1746:

1. I was employed by the defendant, Narco Freedom, Inc. "Defendant" until on or about July 15, 2015 when I was terminated by Defendant.
2. Narco Freedom, Inc. owes me \$52,747.35 in accrued sick time representing 889.5 hours; \$59,181.40 in accrued personal time representing 998 hours; and \$66,238.10 in accrued vacation time representing 1117 hours.
3. My total accrued hours are 3004.5.
4. Narco Freedom, Inc. owes me \$178,166.85 in accrued time.
5. I am joining in Alan Brand's motion for an order directing the defendant to pay accrued time insofar as it applied to the funds the defendant owes me.
6. I declare the foregoing is true.

Dated: October 30, 2015  
Garden City, New York



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Jason Brand